

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

24 MAG 3225

UNITED STATES OF AMERICA

v.

MUHAMMAD SHAHZEB KHAN,
a/k/a “Shahzeb Jadoon,”

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 2339B,
3238, and 2

SOUTHERN DISTRICT OF NEW YORK, ss.:

KHAJAE HESTER, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation (“FBI”) and charges as follows:

Count One

(Attempted Provision of Material Support and Resources to a Designated Foreign Terrorist Organization)

1. From at least in or about November 2023, up to and including on or about the date of the filing of this Complaint, in Canada, the Southern District of New York, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally attempted to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham (“ISIS”), which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act (“INA”), and is currently designated as such as of the date of this Complaint, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339(B)(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B, 3238, and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

2. I am a Special Agent with the FBI, and I am assigned to a counterterrorism squad. I have been personally involved in the investigation of this matter. This affidavit is based in part upon my training and experience, my involvement in this and other investigations, my conversations with law enforcement agents and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing

probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

3. MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, is a 20-year-old citizen of Pakistan who currently resides in Canada. As set forth in greater detail below, KHAN is a supporter of ISIS, a designated foreign terrorist organization (“FTO”) that has attacked Americans and American allies around the world. Starting in at least in or about November 2023, KHAN has repeatedly and explicitly expressed his support for ISIS and his desire to carry out terrorist attacks in support of ISIS, including on social media and in communications with two undercover law enforcement officers (“UC-1” and “UC-2,” and, collectively, the “UCs”). During communications with the UCs, which took place over encrypted electronic messaging applications and recorded calls, KHAN repeatedly proclaimed that he planned to use automatic and semi-automatic weapons to carry out mass shootings at Jewish religious centers in the United States.

4. In or around November 2023, MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, began posting on social media and interacting with an individual who was, unbeknownst to KHAN, an FBI confidential source (the “CS”)¹ about (i) KHAN’s support for ISIS, (ii) KHAN’s desire to travel to West Africa to join ISIS-West Africa (“ISWAP”),² and (iii) KHAN’s desire to send money to ISIL Khorasan (“ISIS-K”).³ KHAN also sent pro-ISIS content

¹ The CS was a paid informant for the FBI from approximately 2017 until approximately April 2024. The information provided by the CS has been reliable and has been corroborated by independent evidence, including the electronic communications and other records described herein.

² On February 28, 2018, the U.S. Secretary of State designated ISIS-West Africa as an FTO under Section 219 of the I NA and on February 27, 2018, as a Specially Designated Global Terrorist (“SDGT”) under section 1(b) of Executive Order 13224. The U.S. Secretary of State has also listed the following aliases for ISIS-West Africa: ISIS West Africa Province, Islamic State of Iraq and Syria West Africa Province, Islamic State of Iraq and the Levant-West Africa (ISIL-WA), and Islamic State West Africa Province (ISWAP). To date, ISIS-West Africa remains a designated FTO.

³ On January 14, 2016, the U.S. Secretary of State designated ISIL Khorasan as an FTO under Section 219 of the I NA and on January 21, 2016, as an SDGT under section 1(b) of Executive Order 13224. The U.S. Secretary of State has also listed the following aliases for ISIL Khorasan: The Islamic State of Iraq and ash-Sham-Khorasan Province, Islamic State’s Khorasan Province, ISIS Wilayat Khorasan, ISIL’s South Asian Branch, South Asian chapter of ISIL, The Islamic State of Iraq and Syria-Khorasan, Islamic State of Iraq and Levant in Khorasan Province, Islamic State Khurasan, ISISK, ISIS-K, and IS-Khorasan. To date, ISIL Khorasan remains a designated FTO.

to the CS on an encrypted social media and instant messaging platform (“Encrypted Platform-1”), including ISIS propaganda videos.

5. Starting in or around late July 2024, MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, began communicating with the UCs on a second encrypted messaging platform (“Encrypted Platform-2”).⁴ During those conversations, KHAN told UC-1, in sum and substance, that KHAN and a U.S.-based ISIS supporter (“Associate-1”) had been actively attempting to create “a real offline cell” to carry out a “coordinated assault” in a particular U.S. city (“City-1”) using AR-style rifles, and invited UC-1 to join in their cause to “target[] Israeli Jewish chabads . . . scattered all around [City-1].”⁵

6. From approximately late July to mid-August 2024, MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, discussed with the UCs, via electronic messages and on recorded phone calls, a plot to carry out mass shootings at or around Jewish religious centers and public gathering places in City-1 in support of ISIS. During those conversations, KHAN repeatedly instructed the UCs to obtain AR-style assault rifles, ammunition, and other materials to carry out the attacks, and identified the specific locations in City-1 where the attacks would take place. KHAN also told the UCs that he had identified a human smuggler who would help KHAN cross the border from Canada into the United States, after which KHAN could travel to New York City and then travel by bus to City-1.

7. In the course of their communications, on or about August 20, 2024, KHAN told the UCs, in sum and substance, that they should change their target location to New York City. Specifically, KHAN told the UCs that the target location would now be a Jewish religious center located in Brooklyn, New York (“Location-1”). KHAN conveyed that he hoped to carry out this attack on or around October 7, 2024—which KHAN recognized as the one-year anniversary of the brutal terrorist attacks in Israel by Hamas, a designated FTO, which, on October 7, 2023, launched a wave of violent, large-scale terrorist attacks in Israel that resulted in the deaths and hostage-taking of hundreds of civilians, including American citizens. In selecting New York City as his target location, KHAN told the UCs that “New york is perfect to target jews” because it has the “largest Jewish population In america,” and, as such, “even if we dont attack a[n] Event[,] we could rack up easily a lot of jews.” KHAN then told the UCs that he intended to kill as many Jewish civilians as possible, proclaiming that “we are going to nyc to slaughter them,” and later sending a photograph to the UCs of the specific area inside of Location-1 where KHAN planned to carry out the attack. In the days that followed, KHAN continued to urge the UCs to acquire

⁴ KHAN has used multiple accounts on the social media and encrypted electronic messaging platforms referenced herein to communicate with the CS and the UCs (the “Accounts”). Based on my review of those communications and available subscriber information for the Accounts, as well as my discussions with the UCs, I believe that KHAN, and not another individual, was the user of the Accounts when he communicated with the CS and the UCs because, among other things, the context, timing, subject matter, usernames, and language used in the communications, all indicate that KHAN was the user of the Accounts.

⁵ “Chabad” is a branch of Hasidic Judaism, as well as a movement that operates Jewish religious and educational institutions around the world.

AR-style rifles and other equipment needed for the attack and reiterated his desire to carry out this attack in support of ISIS and to wage jihad.⁶

8. As set forth in detail below, MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, took various steps to ensure that his plan to carry out an attack in support of ISIS would succeed. Among other things, and for example, KHAN (i) invited Associate-1 to a private online group chat with the UCs—whom KHAN believed were also pro-ISIS supporters—for the purpose of planning an attack; (ii) urged the UCs, on numerous occasions, to acquire firearms, ammunition, magazines, tactical gear, and “some good hunting [knives] so we can slit their throats”; (iii) researched and suggested carrying out the attack in New York City, specifically, at Location-1; (iv) sent the UCs several photographs and videos of Location-1 to describe where and how the attack would take place, including a photograph of a particular area inside of Location-1 to carry out the attack; (v) told the UCs to do surveillance on Location-1, and gave them specific instructions on how to carry out that surveillance; (vi) identified specific rental properties close to Location-1, sent the links to those rental properties to the UCs, and requested that they reserve them; (vii) instructed the UCs to obtain burner cellphones and delete all of their contacts to avoid law enforcement detection and questioning of relatives after the attack; (viii) arranged for a human smuggler to help him cross the border into the United States to commit the attack, and told the UCs to continue carrying out the attack if he were detained; (ix) gave the UCs his telephone number, which the UCs then used to further plan the attack with KHAN; (x) obtained a credit card as of September 1, 2024, that he told the UCs he planned to use to cover financial needs for and in advance of the attack; and (xi) on or about September 4, 2024, traveled toward the U.S.-Canada border.

ISIS

9. Based on my training and experience as a counterterrorism agent of the FBI, my involvement in this investigation, including my review of open source materials and foreign and domestic law enforcement reports, and my conversations with other law enforcement agents, I have learned the following, in substance and in part:

a. On or about October 15, 2004, the U.S. Secretary of State designated al Qaeda in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as an FTO under Section 219 of the INA and as an SDGT under section 1(b) of Executive Order 13224. On or about May 15, 2014, the U.S. Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as an SDGT entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The U.S. Secretary of State also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (*i.e.*, “ISIS”—which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the U.S. Secretary of State added the following aliases to the FTO and SDGT listings: Islamic State, ISIL, and ISIS. On March 22, 2019, the U.S. Secretary of State added the following aliases to the FTO and SDGT listings: Amaq News Agency,

⁶ Based on my training, experience, and participation in this investigation, I have learned that “jihad” is an Arabic word commonly used by ISIS supporters to mean “holy war.”

Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

b. On or about September 21, 2014, then-ISIS spokesman Abu Muhammad al-Adnani (“Adnani”) issued a recorded statement calling for attacks against citizens—civilian or military—of the countries participating in the United States-led coalition against ISIS. Adnani specifically called for suicide bombings, shootings, and vehicle attacks.

c. ISIS members and associates make and have made public statements and issued public declarations, which, among other things, (a) proclaimed and acknowledged that acts of violence had been committed by ISIS; (b) threatened future acts of violence if ISIS’s demands were not met; and (c) were intended to promote and foster the prestige and standing of ISIS. ISIS and its affiliates have claimed responsibility for the following terrorist attacks, among others: (i) on or about November 13 or 14, 2015, a group of attackers carried out attacks in Paris, France, which killed approximately 130 people; (ii) on or about March 22, 2016, a group of attackers carried out bombings in Brussels, Belgium, which killed at least 32 people; (iii) on or about July 14, 2016, an attacker used a truck to run over civilians in Nice, France, killing more than 80 people and injuring more than 300; (iv) on or about January 3, 2024, two attackers carried out bombings in Kerman, Iran, killing at least 94 people and wounding many more; and (v) on or about March 22, 2024, a group of assailants stormed a concert hall in Moscow, Russia, killing at least 60 people and injuring over 145.

d. To gain support, ISIS, like many other terrorist organizations, spreads its message using social media, Internet platforms, and email. Using these platforms, ISIS has disseminated a wide variety of recruiting materials and propaganda through social media, which includes photographs and videos depicting ISIS activities, including beheadings and other atrocities, as well as audio and video lectures by members of ISIS and members of other Islamic extremist organizations. Among other Internet and social media platforms, ISIS has popularized the use of end-to-end encrypted communication services and applications as a means of recruiting, communicating with, and disseminating terrorist training materials and propaganda to its members and supporters.

e. The U.S. State Department has reported that, among other things, ISIS has committed systematic abuses of human rights and violations of international law, including indiscriminate killing and deliberate targeting of civilians, mass executions and extrajudicial killings, persecution of individuals and communities on the basis of their religion, nationality, or ethnicity, kidnapping of civilians, forced displacement of various communities and minority groups, and killing and maiming of children, rape, and other forms of sexual violence. According to the U.S. State Department, ISIS has recruited foreign fighters from across the globe and leveraged technology to spread its violent extremist ideology and for incitement to commit terrorist acts.

KHAN Publicly Posts on Social Media in Support of Jihad and Engages in Initial Conversations About Supporting ISIS

10. Based on my training and experience as a counterterrorism agent of the FBI, my involvement in this investigation, including my review of electronic communications and publicly available social media posts, as well as my conversations with other law enforcement officers involved in this investigation, I have learned the following, in substance and in part:⁷

a. Between October 2023 and November 2023, MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon, the defendant, used a particular social media platform (“Social Media Platform-1”) to make several public posts supporting jihad. For example:

i. On or about October 8, 2023, KHAN reposted another user’s post which contained a quote attributed to Sheikh Sulayman Al Ulwan, a Saudi theoretician of militant jihad.

ii. On or about October 27, 2023, KHAN reposted another user’s post containing a graphic depicting a disassembled weapon with Arabic-language text calling for unity of the ummah (*i.e.*, community of Muslims). A copy of the photograph in the post is below:



iii. On or about November 3, 2023, KHAN commented on a public post made by another Social Media Platform-1 user containing a screenshot of a Halummu article entitled “An Islamic State Fighter Executed an Attack Against Nationals of Coalition Countries in the Belgian Capital, Brussels,” in which the user commented, “Another evidence that the most

⁷ All communications referenced herein are being provided in substance and in part unless otherwise indicated.

effective tactics against these arrogant people is the Just Terror Tactics.”⁸ In response, KHAN wrote, in part, “a single attack scares whole of sweden and they’re on a high alert.” A copy of a portion of the screenshot of the post to which KHAN responded is below:



b. On or about November 14, 2023, KHAN posted a positive reaction to a public post made by the CS on Social Media Platform-1, which stated the following: “the term ‘Israeli civilian’ was like saying ‘halal pork.’” That same day, KHAN began communicating with the CS via direct messages on Social Media Platform-1. During the conversation, KHAN stated that he was a Pakistani national living in Canada and stated that, in the United States, “they’ll lock u up on intention of joining Dawlah.”⁹ KHAN also said that he had never met a Dawlah supporter in real life, only online, and that he would “never risk talking [about] this” in real life. KHAN then asked the CS whether the CS used Encrypted Platform-1.

c. Approximately two days later, on or about November 16, 2023, the CS, via direct messages on Social Media Platform-1, told KHAN, “[t]he real worry is that in case [the FBI] do a search warrant on [Encrypted Platform-1] and find my real number.” In response, KHAN wrote to the CS, “they cant [Encrypted Platform-1] isn’t a U.S. based company . . . That is why everyone even [Dawlah’s] official channels use Encrypted Platform-1.” The CS then sent KHAN, via direct message on Social Media Platform-1, the CS’s username for Encrypted Platform-1.

d. As the direct messaging conversation between KHAN and the CS described above was occurring over Social Media Platform-1, KHAN, using an account on Encrypted Platform-1 with a similar username to the account KHAN had been using on Social Media

⁸ Based on my training and experience, and my involvement in this investigation, I know that Halummu is an ISIS-aligned translation and propaganda outlet.

⁹ Based on my training and experience, and my involvement in this investigation, I have learned that “Dawlah” is a reference to ISIS.

Platform-1, greeted the CS on Encrypted Platform-1. KHAN immediately forwarded several links to the CS on Encrypted Platform-1, including a link that KHAN described as the “official bot of Dawlah english translation.”¹⁰

e. The electronic messaging conversation between KHAN and the CS over Encrypted Platform-1 continued for several days. During the conversation, KHAN expressed his desire to travel to West Africa to join ISWAP and to send money to ISIS-K, and KHAN also sent several ISIS propaganda videos to the CS. Additionally, KHAN sent the CS a .pdf file titled “TheIslamicState2015FullEbook (1).pdf,” which KHAN described as having everything “u wanna know about hijrah how the guys made hijrah to syria waging jihad tactics everything.”¹¹ KHAN wrote that “this book is soo beneficial” and that “reading the book is giving me [an] adrenaline rush.” Based on my review of the .pdf file that KHAN sent to the CS, I know that it is approximately 100 pages long and contains a detailed history of ISIS, its leadership, its movement to create an Islamic State caliphate, as well as ISIS propaganda and imagery. Copies of some of the pages from the file that KHAN sent to the CS are below:



¹⁰ Based on my training and experience, as well as my review of publicly available sources, I know that an Encrypted Platform-1 “bot” is a small application that runs within the Encrypted Platform-1 application that can be used to, among other things, communicate with other Encrypted Platform-1 users.

¹¹ Based on my training, experience, and participation in this investigation, I understand “hijrah” (or “hijra”) to be an Arabic term normally used to refer to migration, but which is often used by those with extremist views to describe a foreign fighter’s journey abroad to wage jihad.

f. Thereafter, in or around May 2024, KHAN participated in a particular online group chat on Encrypted Platform-2 consisting of pro-ISIS supporters who shared information about how to carry out coordinated attacks in, among other locations, the United States, Pakistan, and India.

KHAN Plots to Attack City-1

11. Based on my training and experience as a counterterrorism agent of the FBI, my involvement in this investigation, including my review of electronic communications and recorded phone calls between MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, and the UCs, as well as draft summaries of those communications, and my conversations with other law enforcement officers, I have learned the following, in substance and in part:¹²

a. On or about July 28, 2024, KHAN expressed his desire to UC-1—whom KHAN met on Encrypted Platform-2—to create “a real offline cell” of ISIS supporters. KHAN told UC-1 that he and Associate-1 had already begun plans to carry out an attack in City-1 against “zionist jews.” KHAN explained to UC-1 that it would be better if the attack were conducted “indoors in a confined space,” as that would minimize law enforcement’s ability to stop the attack. KHAN also explained that the attack “would be [a] one of a kind attack on the us soil” and that “our purpose is to sacrifice oursel[ves] so that the . . . muslimkeen can wakeup and support the State [*i.e.*, the Islamic State, or ISIS].”¹³ That same day, UC-1 created an invite-only group chat on Encrypted Application-2 and invited UC-2 and KHAN, who in turn invited Associate-1, into the chat.

b. Over the next several days, KHAN continued to discuss his plan to carry out mass shootings in City-1 using AR-style rifles in support of ISIS with the UCs in the private Encrypted Application-2 group chat. For example, on or about July 31, 2024, KHAN told UC-1 to create a cryptocurrency wallet so that Associate-1 could transfer money to UC-1 to purchase “the AR-15,” as well as whether or not certain other individuals might be interested in joining them to wage an attack in City-1.

c. Also on or about July 31, 2024, KHAN continued to elaborate on his plan to carry out a coordinated attack in City-1, telling UC-1, “what I was thinking was if we a[r]e 6 guys splitting into 3 teams of 2 guys and launching 3 attacks simultaneously on diff[erent] locations maximizing casualty count.”

d. During that same conversation, on or about July 31, 2024, KHAN made clear that his planned attack was in support of ISIS. In response to a question from UC-1 about how others would perceive their planned attack, KHAN responded, “[w]e will send our allegiance

¹² Unless otherwise noted herein, the communications described in the subparagraphs below occurred via electronic messages on Encrypted Platform-2.

¹³ Based on my training, experience, and participation in this investigation, I understand “muslimeen” to be an Arabic term used to refer to Muslims.

and bayah video to amaq and explain the reasoning.”¹⁴ KHAN explained that, “if we[']re successful this is going to be one of the largest attacks ever on jews outside of the israeli territory in recent times” and “that too in America would be big and a good propaganda victory for the islamic state[,] especially for those who say IS [*i.e.*, the Islamic State or ISIS] is funded by mosaad and the west.”

e. On or about August 1, 2024, KHAN asked UC-1, among other things, whether UC-1 had seen that “they foiled a[n] ISIS attack here in toronto yesterday.” KHAN stated that one of the two attackers “was spotted on a[n] IS beheading video,” which KHAN believed is why law enforcement had been aware of that attacker. KHAN then said that UC-1 and KHAN needed to “lay low no social media nothin[g]” and that their “cell should be small and well armed.” Additionally, KHAN continued to make further plans to travel to and to wage an attack in the United States. For example, KHAN asked if UC-1 had a “contact” to smuggle him across the United States-Canada border, and stated that he “will try the hike route to the US” if not. KHAN also asked UC-1 if they could go to a shooting range together in the United States, and asked UC-1 to tell “everyone to keep no beard and take the appearance of the kuffar,”¹⁵ in order to not “attract any attention whatsoever.” KHAN stated that “u guys will even have to attend some s[yn]agogue or chabad sessions . . . to check the insides of [t]he buildings.” KHAN explained that it was “v[ery] important” for them to know where emergency exits were located “so we can trap them and kill them inside.” In addition, KHAN also explained that they should not record their ISIS allegiance video, or “bayah,” until later because it would run the risk of them being caught by law enforcement prior to the planned attack.

f. On or about August 4, 2024, KHAN contacted UC-1 and asked, among other things, for the specifications of the firearms that UC-1 had obtained, so that KHAN could find a similar firearm in Canada to practice shooting. KHAN stated that the firearm jamming was his “biggest fear,” and also described how to clear a firearm if it did in fact jam.

g. That same day, KHAN participated in a call with the UCs via a third encrypted communications platform (“Encrypted Platform-3”). During the call, which was recorded, KHAN discussed his planned attack in City-1.¹⁶ KHAN also told the UCs that he had been in contact with a human smuggler who would help KHAN get to City-1 in order to carry out the planned attack. KHAN said that he was looking at potential target locations such as Jewish

¹⁴ Based on my training, experience, and involvement in this investigation, I know that the Amaq News Agency is a news outlet linked to the Islamic State that is often the first point of publication for claims of responsibility for ISIS terrorist attacks in Western countries. On or about March 22, 2019, the U.S. State Department added the Amaq News Agency as part of ISIS in its list of designated FTOs.

¹⁵ Based on my training, experience, and involvement in this investigation, I know that the term “kafir,” or “kuffar,” refers to a non-believer in Islam.

¹⁶ The UCs called a particular phone number that KHAN had previously sent to UC-1 via Encrypted Platform-1 as his contact number, telling UC-1 that they “were gonna give each other call signs so even if God forbid one of us gets compromised the plan doesn’t get wasted.”

religious centers in the City-1 area and that, if they were able to carry out a “massacre” inside those locations, there would be a long standoff with law enforcement. As such, KHAN warned that “we don’t want to run out of ammo and end up surrendering.” In response to UC-2’s question about how much ammunition they should have, KHAN stated that they should have at least 260 to 300 rounds. KHAN discussed finding a rental apartment in a city nearby City-1 but not in the same state (“City-2”), stating that gun laws in City-2’s state are “more relaxed” and they could scout targets, do reconnaissance, and look for routes to transport weapons for their attack. KHAN also told the UCs that he had never shot an AR-15 before and would need to practice with the firearm at a shooting range as much as possible in advance of the attack. KHAN further stated that he would compile a list of Jewish religious centers that could serve as potential targets for the attack, and that he would be deleting everything on his cellphone and encrypting the UCs’ numbers in case he got caught on his trip from Canada to the United States. KHAN then told the UCs that, if KHAN is detained when attempting to cross the border, and the UCs “don’t have any contact of me for like three or four days, you guys can go ahead with your plan.”

h. On or about August 5, 2024, KHAN told UC-1 that he wished to travel to the United States before the winter. KHAN also explained that Associate-1 used to be a “big supporter of HTS,” a reference to Hay-at Tahrir al-Sham, a terrorist group in Syria, but had then “asked [KHAN] questions regarding the state,” an apparent reference to the Islamic State or ISIS, and KHAN “was able to clear his doubts.” KHAN explained that Associate-1 now “supports the state” and that KHAN “used to send him material etc regularly.” KHAN also stated, “whats the point of living till ur 70 and dying on a hospital bed when we can attain shahadah in our youths Inshalah.”¹⁷

i. On or about August 7, 2024, KHAN participated in a call with the UCs via Encrypted Platform-3. During the call, which was recorded, KHAN told the UCs that he was looking at October 7, 2024 as the date to carry out the attack because KHAN believed that there would be large gatherings of pro-Israel demonstrations in City-1 in light of the one-year anniversary of the October 7, 2023 Hamas terrorist attacks in Israel. KHAN conveyed that he planned pay a human smuggler to help him to cross into the United States in September, stay in New York for some time, and then travel toward City-1. KHAN then asked the UCs about their access to firearms and told them that he and Associate-1 would need tactical vests, holsters, and pouches once they had obtained the firearms to carry out the attack.

j. On or about August 11, 2024, KHAN told UC-1 that Associate-1 was now likely “back[ing] out” because Associate-1 was “having conflicting thoughts regarding the attack.” KHAN stated that he had “tr[ie]d to convince [Associate-1] that no point in living a life like this better to die as a martyr in ur youth.” KHAN then told UC-1 that KHAN had committed himself to waging a terrorist attack, stating that they only “need 3 ppl that have pledged allegiance to death inshalah,” and that KHAN had “been praying for martyrdom in every salah since a year or 2 ive never felt this close to it.”

¹⁷ Based on my training, experience, and involvement in this investigation, I know that the term “Shahadah” refers to a declaration of faith. Moreover, based on my training, experience, and participation in this investigation, I understand “inshallah” to be a phrase in Islam meaning God willing.

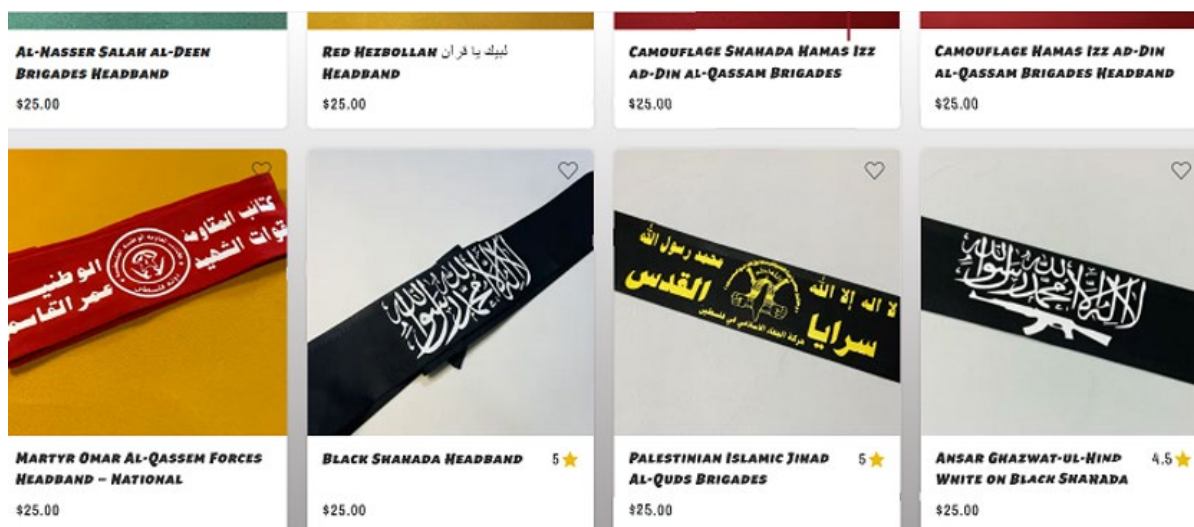
k. The following day, on or about August 12, 2024, KHAN participated in a call with UC-1 via Encrypted Platform-3. During the call, which was recorded, KHAN once again told UC-1 that Associate-1 was backing out of the planned attack in City-1 because Associate-1 was not ready, and that Associate-1's backing out of the planned attack had made KHAN even more determined. KHAN told UC-1 that they would need 900 rounds of ammunition and 10 magazines each, and that KHAN still believed that October 7, 2024 would be the best date to carry out their attack. KHAN then went on to discuss his plan to get to City-1 once he crossed into the United States, including by traveling through New York and taking a bus from New York City to City-1.

l. On or about August 13, 2024, KHAN contacted the UCs, and stated that he was planning to give his landlord notice and vacate his apartment in order to begin his journey to the United States to carry out the attack. KHAN indicated that he had organized travel with his human smuggler, and that once KHAN crossed into the United States from Canada, he wished to travel to a particular U.S. city ("City-3"), or to City-1, to "regroup" with the UCs "and then we should have a m[o]nth to scout and prepare. If we wanna go for oct 7 or oct 11 Yom kippur a major festival for the jews." KHAN emphasized that "Oct 7th and oct 11th are the best days for targeting the jews" because "oct 7 they will surely have some protests and oct 11 is yom.kippur," and "they dont have any other major festival then till next summer[.]" KHAN further stated that "in these 2-3 weeks u guys can finish up buying the mags and ammo." Later that day, KHAN sent the UCs certain documents, one of which was entitled "Virtues of Martyrdom" which I understand to be a treatise based on a five-part lecture series delivered by Shayk Harith an-Nadhari, a senior official in the FTO Al Qaeda in the Arabian Peninsula (AQAP).

m. On or about August 14, 2024, KHAN participated in call with the UCs via Encrypted Platform-3. During the call, which was recorded, KHAN informed UC-2 that Associate-1 had backed out of the plan because Associate-1 was not ready and assured UC-2 that Associate-1 would not tell others about the planned attack. KHAN then asked the UCs about their access to the firearms that they would use to carry out the attack, including by asking UC-2 whether UC-2 could buy a fully automatic AR-style rifle. KHAN once again offered to scout various Jewish religious centers in City-1 and continued to explain why he believed that conducting the attack on October 7, 2024 was preferable, including because they would be able to find bigger crowds that day and the attack would have a greater effect. KHAN told the UCs that they should plan to be in City-1 three to four weeks before the attack to plan out routes and buy "kits" to wear for the attack. UC-2 then asked KHAN whether they should send their "bayah" videos to Associate-1. In response, KHAN told UC-2 that it would be best if they filmed their videos once they were all together, and that KHAN had contacts within the media wing of ISIS-K to whom he would send the videos so that they could be posted online after the attack. Toward the end of the call, KHAN told the UCs to start stocking up on ammunition and magazines and that he believed that they should each carry 10 magazines per person for the attack.

n. Between on or about August 15, 2024 and on or about August 18, 2024, KHAN continued to communicate about his planned attack with the UCs. For example:

i. On or about August 15, 2024, KHAN sent the UCs a link to a website that sells, among other things, headbands with symbols for various terrorist organizations, as well as an image of a black Shahadah headband commonly used by ISIS supporters (the "Headband"), as shown below:



ii. That same day, KHAN also suggested that they purchase an “ammo box”; noted that “for a rifle you would need a suitcase to[o]”; and provided information about obtaining a firearm in a particular U.S. state, including that “if ur background check is clear in [that state] u can purchase a weapon [very] easily theres no waiting period”; the process in [that state] “is [very straight] forward takes a few minutes”; and “u wont need any licenses anything for possessing a long rifle in [that state] or even a handgun.”

iii. On or about August 16, 2024, KHAN asked the UCs to consider purchasing a firearm from “a Federal licenses buyer [because] it’ll be easy and more quick and the gun more reliable.” In response to a discussion regarding a plan to purchase a used “AR-15 long barrel rifle” from UC-2’s contact, KHAN responded “perfect” and asked which “optics” UC-2 planned to buy, a reference to devices that help shooters aim with precision and speed. KHAN responded, “this is good buy the one ur comfortable with.” When KHAN asked UC-1 for “updates” and if he “visited the shops,” UC-1 stated he got “10 today . . . 30 [round] mags.” KHAN responded “MASHALAH.”¹⁸

iv. On or about August 17, 2024, KHAN asked UC-2 when UC-2 was “purchasing the rifle.” KHAN said that, in connection with purchasing the rifle, “go with a good scope with suits u” and asked again about a handgun because he wanted to “mak[e] sure no weapon jams” and “we dont get caught alive.” KHAN also asked for further details about magazines and ammunition and asked the UCs to pray that he “gets to u guys successfully.”

v. On or about August 18, 2024, KHAN sent the UCs a particular document and told the UCs they “must read this [. . .] a martyr bypasses all this questioning of the grave etc.” KHAN also resent the image of and website for the Headband, as well as a link to a website selling a particular camouflage shirt.

o. On or about August 18, 2024, KHAN participated in a call with the UCs via Encrypted Platform-3. On the call, which was recorded, KHAN told the UCs that he was finalizing

¹⁸ Based on my training, experience, and involvement in this investigation, I know that the term “Mashallah” is an Arabic phrase that means “God has willed it” and is often used to express excitement or thanks that something has occurred.

the target location and was “90% sure” it would be a public plaza in the middle of City-1, which KHAN explained was approximately one block away from a Jewish convention center and also in the vicinity of locations where he believed pro-Israel gatherings would take place. KHAN further encouraged the UCs to purchase AR-style rifles, ammunition, and magazines to carry out the attack, as well as holsters, boots, and other materials needed for their “kits.” After once again discussing his plan to hire a human smuggler to transport him into the United States and then travel to City-1, KHAN told the UCs that they would need to destroy their phones prior to the attack and that KHAN would be destroying his laptop and completely “erasing everything” once he crosses into the United States. KHAN conveyed how other pro-ISIS supporters have been caught by law enforcement because of their social media posting and communications, and suggested that they should be leaving any online group chats to avoid detection.

p. On the same call, KHAN also explained that, because the planned attack would be “affiliated with the Islamic State,” it was important to not have any personally identifying information on them at the time of the attack so that law enforcement would not question their friends and relatives. KHAN further discussed their need to order black flags for the attack and stated that he had already made up his mind that he would not be alive two months from now.

q. On or about August 19, 2024, KHAN told the UCs that he “was able to get a 1000\$ credit card,” which “inshallah arrive[s] next week [and] would ease the burden for the smuggler.”

KHAN Plots to Carry Out an Attack in the New York City Area

12. Based on my training and experience as a counterterrorism agent of the FBI, my involvement in this investigation, including my review of electronic communications and recorded phone calls between MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, and the UCs, as well as draft summaries of those communications, and my conversations with other law enforcement officers, I have learned the following, in substance and in part:¹⁹

a. On or about August 20, 2024, KHAN changed the target location for his planned terrorist attack from City-1 to New York City.

b. That day, KHAN told the UCs, “brothers, hear me out, why not we do an attack in New York[?].” KHAN went on to explain that the “population of jews in new York city is 1 million” and told the UCs to check particular New York City neighborhoods “on Google maps[,] tons of Jews walking around the neighborhood[,] hundreds of synagogues.” KHAN then wrote that New York City has the “largest jewish population in America.” KHAN also stated that New York was “[very] unprotected” and “perfect to target jews.” KHAN then stated that they should attack neighborhoods in which Jewish civilians were “walking around” so that “even if we don’t attack an event we could rack up easily a lot of jews.” KHAN stated that “City-1 is nothing compared to nyc” as it has only “175k jews.” KHAN also told the UCs that he had researched short-term apartment rentals in New York, determining it would cost approximately \$3,000 for a month.

¹⁹ Unless otherwise noted herein, the communications described in the subparagraphs below occurred via electronic messages on Encrypted Platform-2.

c. The following day, on or about August 21, 2024, KHAN told the UCs, “Brothers . . . we are going to nyc to slaughter them Inshalah.” KHAN also sent the UCs links to a video depicting members of the Hasidic Jewish community in Brooklyn, a video depicting Location-1, and a link to a Google map showing Location-1. KHAN also stated “Allah make us successful” and told the UCs that Location-1 has “[t]he most any Jews gather anywhere” and that “[Location-1] [is] the ultra orthodox hasidic jews world headquarters” and the “largest in the world.”

d. On or about August 23, 2024, KHAN asked whether either of the UCs “looks like an ashkenazi jew” and told them that neither should “shave [their] beard or mustache” “and dont forget to bring a Black coat pant and a white dress shirt” and “to conceal ur phones when u go inside and make videos.” KHAN stated that UC-1 “would have to be the One who does the recque,” which I understand to be a reference to conducting reconnaissance of Location-1 prior to the planned attack. KHAN then explained that Location-1 has tours during the daytime for tourists, but that “if u look like a Hasidic jew u can get in any time with a torah in the hand and [their] jew ou[t]fit.” KHAN also said that he was asking his human smuggler to determine if KHAN could be smuggled across the United States-Canada border the first week of September 2024, and that a driver would be able to bring KHAN to the New York City area, with the “default location” being a particular neighborhood in Queens. Finally, KHAN also stated that they might want to consider attacking Location-1 before October 7, 2024, because “oct 7 is gonna be high alert anyways all around.”

e. On or about August 24, 2024, UC-1 wrote, “Not sure if you guys saw . . . May Allah SWT reward them,” and KHAN replied to ask if UC-1 was referencing “the Russian prison incident.”²⁰ KHAN then stated, “Mashalah vv courageous brothers,” “just with knives,” and “they even managed to make a suicide vest in the prison.” KHAN also told UC-1 that if UC-1 “wanna order the black Shahadah flag which we would be needing its available again” which was “out of stock b4 on the website.” KHAN also asked whether the UCs had purchased their camouflage shirts for the attack.

f. On or about August 25, 2024, KHAN expressed his desire to the UCs that others “who live closeby should make sleeper cells” and that he “hope[d] they get motivated as well.” KHAN confirmed that he would be vacating his apartment in Canada “this 1st september,” and would be “waiting for” the UCs “now [that] im done on my end.” KHAN also sent a photo that he described as “the target location” and “the main basement hall of [Location-1].” Based on my review of publicly available sources, I have learned that the photograph that KHAN sent to the UCs is a photograph of a common area within Location-1. KHAN also asked UC-1 if he had secured more ammunition, and UC-1 responded that he had “about 400” and would “buy another round of 125.” KHAN responded, “were good on ammo now.”

²⁰ Based on my participation in this and other investigations, as well as my training and experience, I believe that KHAN was referring to news reports that inmates at a Russian penal colony took hostages, fatally stabbed approximately four staff members, and posted online videos describing themselves as ISIS militants on or about August 23, 2024.

g. On or about August 26, 2024, KHAN sent the UCs a photograph of the Headband that he had been urging the UCs to purchase for the attack. A copy of the photograph is below:



h. From on or about August 27, 2024 to on or about August 29, 2024, KHAN continued to discuss his plan to travel toward New York City in September to carry out his plan to attack Location-1, the weapons and ammunition he wanted to use to carry out the attack, and the need to book a rental apartment in the vicinity of Location-1 and purchase burner cellphones and tactical gear for the attack, including the Headband and “some good hunting [knives] so we can slit their throats.” On or about August 29, 2024, KHAN wrote that “if we succeed with our plan this would be the largest Attack on US soil since 9/11.”

i. On or about August 30, 2024, KHAN told the UCs that they could order and send any tactical gear for the attack, including the Headband, to a P.O. box in Manhattan, New York that UC-1 had purchased. KHAN also wrote that he had been looking into Location-1 and “it’s [very] crowded if u guys have spare money try buying some more ammo and mags we would be needing every bullet and magazines” because “upwards of 300+ jews are always in [Location-1,] even more[,] and plus [the] encounter with the anti terrorism squad could also be long for which we would require ample ammo.” KHAN then sent the UCs several YouTube videos of Location-1 and wrote, “brothers remember the target we have chosen is no ordinary target its like the Mecca for jews the most important site for ultra orthodox jews after temple mount.”

j. On or about August 31, 2024, KHAN continued to send several links to the UCs for potential rental properties in or around Brooklyn, New York. With respect to one rental property in particular, KHAN told the UCs that he was “in touch with the owner” and that the property was “[very] good [very private].” KHAN also sent the UCs what appears to be a message from an owner or manager of one of the rental properties to KHAN.

KHAN Finalizes Plans to Travel to the United States to Conduct the Attack

13. Based on my involvement in this investigation, including my conversations with other law enforcement officers and my review of reports and documents prepared by others, I have learned the following, in substance and in part:

a. On or about September 1, 2024, law enforcement officers in Canada observed MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, appearing to move out of his known residence, as KHAN told the UCs he planned to do prior to attempting to cross the border to carry out the attack. *See supra* ¶¶ 11(l), 12(f).

b. On or about September 1, 2024, KHAN activated a new credit card in Canada, as KHAN told the UCs he had planned to do to prior to attempting to cross the border to carry out the attack. *See supra* ¶ 11(q).

14. Based my involvement in this investigation, including my review of electronic communications and recorded phone calls between MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, and the UCs, as well as draft summaries of those communications, and my conversations with other law enforcement officers, I have learned the following, in substance and in part:²¹

a. On or about September 1, 2024, KHAN sent the UCs photographs of himself wearing a backpack and standing next to a suitcase, telling the UCs, “alright brothers locked and loaded waiting for wednesday morning now.” KHAN then sent a photograph of Canadian currency to the UCs and said “money [for the] smuggler.” A copy of that photograph is below:



b. That same day, KHAN asked the UCs if they owned a laptop and said, “I will be needing a laptop to identify if there are any hidden cameras in the [rental property].” KHAN then told the UCs to download a particular application (“Application-1”), which, based on my review of publicly available information, appears to be a tool that searches for hidden cameras connected to the same Wi-Fi network as the user of Application-1.

²¹ Unless otherwise noted herein, the communications described in the subparagraphs below occurred via electronic messages on Encrypted Platform-2.

c. The following day, on or about September 2, 2024, KHAN sent the UCs another link to a rental property, told them that he was “talking to [the owner] [right now],” and asked the UCs to “book it.”

d. Later that day, KHAN participated in a call via Encrypted Platform-3 with UC-1. During the call, which was recorded, UC-1—who was in Manhattan at the time of the call—told KHAN that UC-1 was in Manhattan. KHAN then told UC-1 what KHAN planned to tell law enforcement if he were stopped attempting to cross the border. KHAN also said that UC-1 should download Application-1 and that they would speak again later that day so that KHAN could show UC-1 how Application-1 works.

15. Based on my involvement in this investigation, including my conversations with other law enforcement officers and my review of reports and documents prepared by others, I have learned the following, in substance and in part, about events on or about September 4, 2024:

a. At approximately 5:40 a.m., law enforcement officers in Canada observed MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, enter a particular vehicle (“Vehicle-1”) in or around Toronto, Canada. Vehicle-1 then picked up additional passengers and traveled toward Napanee, Canada. KHAN and the additional passengers were then observed entering another vehicle in or around Napanee, Canada (“Vehicle-2”). Vehicle-2, which was operated by a new driver, then traveled eastbound toward Montreal, Canada.

b. At approximately 11:29 a.m., KHAN and an unidentified female exited Vehicle-2 in or around Montreal, Canada. Approximately ten minutes later, KHAN and the unidentified female entered a third vehicle (“Vehicle-3”), which was operated by another new driver. Vehicle-3 then proceeded southbound in the direction of the U.S.-Canada border.

c. At approximately 2:54 p.m., law enforcement officers stopped Vehicle-3 in or around Ormstown, Canada, which is approximately twelve miles from the U.S.-Canada border.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.

FURTHER, the Government respectfully moves for this Complaint and the associated arrest warrant to remain sealed, with the exception that this Complaint and the arrest warrant are unsealed or the limited purpose of disclosing the existence of or disseminating this Complaint and/or arrest warrant to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendant or to secure the defendant’s arrest, extradition, or expulsion as otherwise required for purposes of national security.

Khajae Hester (by VF with permission)

Khajae Hester
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 4th day of September, 2024.



THE HONORABLE VALERIE FIGUEREDO
United States Magistrate Judge
Southern District of New York